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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DARRYL LEE WRIGHT,

14 Defendant.

NO. CR14-5539BHS

GOVERNMENT'S MOTION FOR
DETENTION

15
16 The United States moves for detention of the Defendant, pursuant to 18 U.S.C. §
17 3142(e) and (f).

18 1. Eligibility of Case. This case is eligible for a detention order because this
19 case involves:

- 20
21 — Crime of violence (18 U.S.C. § 3156)
22 — Crime of Terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum
23 sentence of ten years or more
24 — Crime with a maximum sentence of life imprisonment or death
25 — Drug offense with a maximum sentence of ten years or more
26 — Felony offense and defendant has two prior convictions in the four
27 categories above, or two State convictions that would otherwise fall within
28 these four categories if federal jurisdiction had existed

- 1 ___ Felony offense involving a minor victim other than a crime of violence
- 2 ___ Felony offense, other than a crime of violence, involving possession or use
- 3 of a firearm, destructive device (as those terms are defined in 18 U.S.C. § 921), or any
- 4 other dangerous weapon
- 5 ___ Felony offense other than a crime of violence that involves a failure to
- 6 register as a Sex Offender (18 U.S.C. § 2250)
- 7 ___ Serious risk the defendant will flee
- 8 X Serious risk of obstruction of justice, including intimidation of a
- 9 prospective witness or juror
- 10 2. Reason for Detention. The Court should detain defendant because there are
- 11 no conditions of release which will reasonably assure (check one or both):
- 12
- 13 X Defendant's appearance as required
- 14 X Safety of any other person and the community
- 15
- 16 3. Rebuttable Presumption. The United States will invoke the rebuttable
- 17 presumption against defendant under § 3142(e). The presumption applies because:
- 18 ___ Probable cause to believe defendant committed offense within five years of
- 19 release following conviction for a "qualifying offense" committed while on
- 20 pretrial release
- 21 ___ Probable cause to believe defendant committed drug offense with a
- 22 maximum sentence of ten years or more
- 23 ___ Probable cause to believe defendant committed a violation of one of the
- 24 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or
- 25 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism)
- 26 ___ Probable cause to believe defendant committed an offense involving a
- 27 victim under the age of 18 under 18 U.S.C. §§ 1591, 2241, 2242,
- 28 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3),
- 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425

1 4. Time for Detention Hearing. The United States requests the Court conduct
2 the detention hearing:

3 At the initial appearance

4 X After continuance of 3 days (not more than 3)
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6 DATED this 29th day of January, 2015.

7 Respectfully submitted,

8 ANNETTE L. HAYES
9 Acting United States Attorney

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11 _____
12 DAVID REESE JENNINGS
13 Assistant United States Attorney